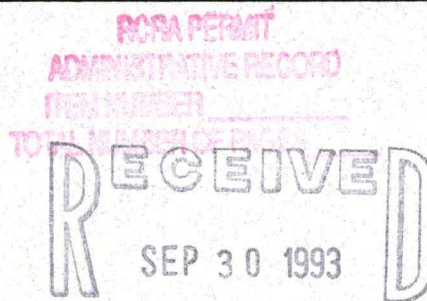




**BURLINGTON  
ENVIRONMENTAL**



WAD 2917  
FF# 7c  
9-29-93

September 29, 1993

CERTIFIED MAIL

FILE COPY

Mr. David Croxton  
U.S. EPA  
1200 Sixth Avenue, M/S HW-106  
Seattle, WA 98101

Mr. Croxton:

Enclosed are the Burlington Environmental Inc. comments to the March 31, 1993 Interim Final RFA, Port of Seattle/Burlington Environmental Inc. Pier 91 Facility.

If you have any questions please contact me at (206) 654-8153.

Sincerely,

John Stiller  
Project Coordinator

cc: Galen Tritt - Ecology NWRO

USEPA RCRA



3012523



Burlington Environmental Inc. Comments to:

Interim Final RFA  
Port of Seattle/Burlington Environmental Inc.  
Pier 91 Facility, Seattle WA  
March 31, 1993

- S1.2 p3      Names misspelled: Julie Slocum, Marlys Palumbo.
- S2.2.1. p6      Third paragraph: Burlington is a lessee at Pier 91 and does not own the property. The word "acquired" should be replaced by "leased".
- S2.2.2. p7      First paragraph: Tanks 90 & 106 are also subleased to Panoco. Tank 97 is not.
- S2.3 p14      Second paragraph: The second sentence incorrectly states that PSAPCA issued NOV's to the "BEI Terminal 91 Facility". The NOV's were issued solely to Panoco. The phrase "BEI Terminal 91 Facility" should be replaced by "Panoco".
- S3.2 p16      The indented paragraph describing the RFI soil borings shown in [Figure 4] is misleading and inaccurate. The proposed boreholes and hand-auger borings (HA-3 through HA-10) had not been sampled and/or analyzed when this RFA was completed. The description of the extent of contamination should be qualified to reflect this training.
- S3.3 p16      This section incorrectly states that BEI discharges stormwater (treated or otherwise) directly to Elliott Bay. BEI only discharges stormwater to the Metro sewer system under its POTW permit. BEI does not have or require an NPDES permit.
- S3.4 p19      First paragraph: without knowing specific levels and types of contaminants, if any, which may be discharged to Elliott Bay, it is incorrect to state that "contaminants discharged to Elliott Bay would impact aquatic flora and fauna". The word "would" should be replaced by "could".



- S4.1.1. p22      Third paragraph: Tank 165 has not been scrapped but has been removed from service.
- Fourth paragraph: Tank 118 has not been scrapped but has been removed from service.
- Fifth paragraph: Tank 91 is in the Black Oil Yard. The spill occurred in the Marine Diesel Oil Yard from Tank 94. The material spilled was "high pour oil" which solidifies at 60° F. The conclusion that this material contributed to downgradient contamination is not accurate.
- Sixth paragraph: Tanks 90 & 106 are also subleased to Panoco. Tank 97 is not.
- S4.1.2. p23      First paragraph: The correct designation is tank 2313, not 3013.
- S4.1.3. p24      Third paragraph: This area is covered by concrete not asphalt.
- S4.1.4. p24      This entire section is inaccurate. The API separator is a sealed unit which was cleaned when decommissioned in 1986, and no potential for any type of release exists.
- S4.1.5. p25      This oil water separator was operated by Panoco and has never been used by BEI. It was taken out of service by Panoco in 1989.
- S4.1.6. p25      These tanks were placed on concrete containment pads.
- S4.1.7. p26      These tanks were placed on concrete containment pads.
- S4.1.8. p26      The circumstances surrounding this SWMU 24 are alleged and the conclusions drawn are without merit.
- S4.1.9. p28      The first paragraph describes two different things. Sentences 1-4 describe piping within the three "yards" and the remainder of the paragraph describes a release attributed to Panoco operations. There has never been a release from the piping described as decommissioned and filled with concrete. This entire section is inaccurate for the reasons described above.

- S4.1.10. p29 The material was released to blind catch basins on site, not storm drains. There is no potential for release to surface waters. Again, BEI does not discharge to Elliott Bay, but under a POTW permit to Metro.
- S4.2.1. p30 The source of the material formerly stored in the concrete berms was a 1983 Panoco spill at Berth C, and is not from a BEI spill as stated.
- S4.2.2. p31 General: This building is used for boiler fuel (product). References to "waste oil" are inaccurate and misleading.
- S4.5.3. p44 Photograph 42 does not show a berth station, but rather the piping outside the SE corner of the Black Oil Yard.
- S5.1. p49 The presence of a dead bird is not relevant to this RFA, and it should not be implied as a indicator to the presence of contamination in this area.
- S5.2 p49 The statement "Eleven inches of free product were found in an upstream well during the 1989 removal of Tank T-91-N (port of Seattle, 1992)" is overly speculative and should be modified to indicate that the well is upgradient, not upstream. The text should further indicate that according to the HLA report (HLA, 1990), the tank was observed to have puncture holes and numerous corrosion holes.
- Table 1 p50 Tank T-910 was removed in 1986.
- S5.8 p51 The title of AOC 8 is misleading and inaccurate. The contaminated soil is not on BEI leased property nor is it a result of BEI operations.
- S6.1.1. p55 The final sentence of paragraph one states that soil staining was observed around the API gravity separator (SWMU 20). There is no exposed soil in this area. See comments made to S4.1.4. p24.
- Paragraph two: As described in the comments to S4.1.5. p25, SWMU 21 cannot be attributed to BEI. The circumstances surrounding SWMU 24 are alleged and the conclusions drawn are without merit. The 1974 release was attributed to Panoco operations not BEI, and was not from the inactive transfer piping as described (see comments to S4.1.9. p28).

S6.2 p58      Again, the presence of a dead bird in noted. See comments to S5.1. p49.

APPENDIX A  
1988 RFA by Tetra Tech

S.5.4.3. p 55      The sample bottles observed with the general refuse were empty. This same error is allowed in photograph 36.

APPENDIX B  
Photo log  
1993 RFA by PRC Environmental

No. 4              Oil water separator is located on Pier 91, not south of Pier 91.

No. 41             This berth station is located within a steel box, not a wooden box as described.

No. 42             This is not a berth station, but rather is a picture of the piping outside the SE corner of the Black Oil Yard.

No. 48             This is not an abandoned pipeline as described, but rather old valves stored on a skid.

APPENDIX D  
VSI Trip Report  
1993 RFA by PRC Environmental

Names, p1      Names misspelled: Julie Slocum, Marlys Palumbo. Other corrections: R. Atwood BEI Operations; M. Brandeberry BEI (attorney); Marlys Palumbo BEI (attorney).

Page 1 Paragraph 5: The drum observed contained bentonite and drill cuttings from the RFI activities underway at the time.

Page 2 Paragraph 6: The recovered diesel is stored at the recovery system and is not transferred directly to Panoco for use.